

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America
ex rel. ALEX DOE, Relator,

The State of Texas
ex rel. ALEX DOE, Relator,

The State of Louisiana
ex rel. ALEX DOE, Relator,

Plaintiffs,

v.

Planned Parenthood Federation of America,
Inc., Planned Parenthood Gulf Coast, Inc.,
Planned Parenthood of Greater Texas, Inc.,
Planned Parenthood South Texas, Inc.,
Planned Parenthood Cameron County, Inc.,
Planned Parenthood San Antonio, Inc.,

Defendants.

NO. 2:21-CV-00022-Z

DECLARATION OF SETH BAGLIN

I, Seth Baglin, declare and state as follows:

1. I am a counsel at O'Melveny & Myers LLP and, under supervision of partners at O'Melveny, represent Defendant Planned Parenthood Federation of America, Inc. ("PPFA") in the above-captioned action.

2. I am familiar with the claims and allegations in this litigation. I am over the age of 18 and have personal knowledge of the matters herein.

3. I make this declaration in support of PPFA's Opposition to the State of Texas's Motion to Compel Production of Documents Identified on Defendants' Privilege Logs. If called upon to testify, I could and would testify to the facts in this declaration.

4. I have reviewed the challenged PPFA privilege log entries and underlying documents identified in Plaintiffs' Motion to Compel Defendant's Production of Documents Identified on Defendants' Privilege Logs

5. All of Plaintiffs' 91 challenged documents appear on PPFA's privilege log because the communications involve members of PPFA's Litigation and Law Department, Jennifer Sandman (89 logged communications) and Carrie Flaxman (3 logged communications).

6. 10 of the 91 challenged documents contain privileged communications that involve members of PPFA's communications department.

7. 26 of the 91 challenged documents do not relate to the underlying Medicaid-termination proceedings of the Affiliates and are identified below:

PRIV-002291	PRIV-002315	PRIV-002324	PRIV-002325
PRIV-002326	PRIV-002327	PRIV-002328	PRIV-002329
PRIV-002330	PRIV-002331	PRIV-002332	PRIV-002333
PRIV-002334	PRIV-002335	PRIV-002336	PRIV-002337
PRIV-002338	PRIV-002340	PRIV-002369	PRIV-002373
PRIV-002374	PRIV-002375	PRIV-002392	PRIV-002394
PRIV-002395	PRIV-002396		

Executed on December 21, 2022 in Los Angeles, California.



Seth Baglin